

Tuesday, December 12, 2023

Bulletin #2023-AC-032

NOTICE TO ALL CUSTOMERS

Important Compliance Regulation Z Process Change

Regulation Z was updated April 2, 2022 (TRID 2.0) to clarify that the written list of providers must correspond to the Loan Estimate (LE). The intent of the change was to ensure transparency to borrowers as they compared the service provider list to Section C of the LE. FLCBank continues to see instances where this change is not being followed therefore causing a violation of TRID.

Beginning with loans reviewed by FLCBank on **December 13, 2023**, a set up condition will be applied to loans that are not in compliance with the regulation. On loans where the initial disclosures are prepared by FLCBank, we will also notify the customer at the time of the Fee Entry review.

Below is an example of a compliant Section C of the Loan Estimate and the Service Provider List.

C. Services You Can Shop For	\$3,013
Title - Closing Fee	\$150
Title - Closing Protection Letter	\$25
Title - Courier Fee	\$20
Title - E/Recording Fee	\$7
Title - Endorsement Fees	\$50
Title - Lender's Title Insurance	\$1,993
Title - Notary Fee-Mobile	\$250
Title - Settlement Fee	\$518

Additional Details for Services You Can Shop For			
To get you started with shopping, this list identifies some providers for the services you can shop for (see Section C on page 2 of your Loan Estimate).			
Service Provider List		You can select these providers or shop for your own providers.	
Service	Estimate	Provider We Identified	Contact Information
Title Settlement Fee	\$518	Westminster Title Agency, Inc.	1180 N. Town Center Drive Suite 100 Las Vegas, NV 89144 702-945-2729
Title Endorsement Fees	\$50		
Title-Closing Fee	\$150		
Title-Courier Fee	\$20		
Title Lender's Title Insurance	\$1,993		
Title-Notary Fee-Mobile	\$250		
Title Closing Protection Letter	\$25	First American Title Insurance Company	8311 W. Sunset Rd Suite 150 Las Vegas, NV 89113 702-263-1225
Title E/Recording Fee	\$7	Simplifile	5072 North 300 West Provo, UT 84604 800-460-5657

Background

§ 1026.19(e)(1)(vi)(C) **Written list of providers.** If the creditor permits the consumer to shop for a settlement service it requires, § 1026.19(e)(1)(vi)(C) requires the creditor to provide the consumer with a written list identifying at least one available provider of that service and stating that the consumer may choose a different provider for that service. The settlement service providers identified on the written list required by § 1026.19(e)(1)(vi)(C) must correspond to the required settlement services for which the consumer may shop, disclosed under § 1026.37(f)(3). See form H-27 in appendix H to this part for a model list.

If you have any questions, please contact your [Account Executive or Client Relations Representative](#).